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2006 NOV 22 A 8:13

AZ CORP COMMISSION  
DOCUMENT CONTROL**BEFORE THE ARIZONA CORPORATION COMMISSION**

In the Matter of: ) NO. S-20484A-06-0669

AGRA-TECHNOLOGIES, INC.; )

**ANSWER AND REQUEST FOR HEARING**WILLIAM JAY PIERSON and SANDRA )  
PIERSON; )

(Campbell Only)

RICHARD ALLEN CAMPBELL and )  
SONDRA JANE CAMPBELL; )

Arizona Corporation Commission

**DOCKETED****NOV 22 2006**WILLIAM H. BAKER, JR. and PATRICIA )  
M. BAKER; )JERRY J. HODGES and JANE DOE )  
HODGES; )LAWRENCY KEVIN PAILLE and JANE )  
DOE PAILLE; )

Respondents. )

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*SEL*

20 Respondents Campbell ("Answering Respondents") admit, deny and allege in response  
 21 to the Temporary Order To Cease And Desist And Notice of Opportunity to be Heard dated  
 22 October 18, 2006 ("TRO"), as follows:  
 23 Answering the allegations contained in NOTICE portion of the TRO, these Answering  
 24 Respondents deny the same.  
 25

**ANSWERS TO NUMBERED PARAGRAPHS**

1. Answering the allegations contained in paragraph 1 of the TRO, these Answering Respondents admit the same.
2. Answering the allegations contained in paragraph 2 of the TRO, these Answering Respondents admit the same.
3. Answering the allegations contained in paragraph 3 of the TRO, these Answering Respondents admit the same.
4. Answering the allegations contained in paragraph 4 of the TRO, these Answering Respondents admit the same.
5. Answering the allegations contained in paragraph 5 of the TRO, these Answering Respondents admit the first sentence but deny the second sentence thereof.
6. Answering the allegations contained in paragraph 6 of the TRO, these Answering Respondents admit the same.
7. Answering the allegations contained in paragraph 7 of the TRO, these Answering Respondents admit the same.
8. Answering the allegations contained in paragraph 8 of the TRO, these Answering Respondents admit the same.
9. Answering the allegations contained in paragraph 9 of the TRO, these Answering Respondents admit the same.
10. Answering the allegations contained in paragraph 10 of the TRO, these Answering Respondents admit the same.

1 11. Answering the allegations contained in paragraph 11 of the TRO, these Answering  
2 Respondents admit the same.

3 12. Answering the allegations contained in paragraph 12 of the TRO, these Answering  
4 Respondents admit the same.

5 13. Answering the allegations contained in paragraph 13 of the TRO, these Answering  
6 Respondents admit the same.

7 14. Answering the allegations contained in paragraph 14 of the TRO, these Answering  
8 Respondents admit the same.

9 15. Answering the allegations contained in paragraph 15 of the TRO, these Answering  
10 Respondents deny the same, but admit the remainder of the allegations.

11 16. Answering the allegations contained in paragraph 16 of the TRO, these Answering  
12 Respondents deny the same as to these Answering Respondents.

13 17. Answering the allegations contained in paragraph 17 of the TRO, these Answering  
14 Respondents deny the same as to these Answering Respondents.

15 18. Answering the allegations contained in paragraph 18 of the TRO, these Answering  
16 Respondents deny the same as to these Answering Respondents.

17 19. Answering the allegations contained in paragraph 19 of the TRO, these Answering  
18 Respondents deny the same as to these Answering Respondents.

19 20. Answering the allegations contained in paragraph 20 of the TRO, these Answering  
20 Respondents deny the same as to these Answering Respondents.

21 21. Answering the allegations contained in paragraph 21 of the TRO, these Answering  
22 Respondents deny the same as to these Answering Respondents.

1 22. Answering the allegations contained in paragraph 22 of the TRO, these Answering

2 Respondents deny the same as to these Answering Respondents.

3 23. Answering the allegations contained in paragraph 23 of the TRO, these Answering

4 Respondents deny the same as to these Answering Respondents.

5 24. Answering the allegations contained in paragraph 24 of the TRO, these Answering

6 Respondents deny the same as to these Answering Respondents.

7 25. Answering the allegations contained in paragraph 25 of the TRO, these Answering

8 Respondents deny the same as to these Answering Respondents.

9 26. Answering the allegations contained in paragraph 26 of the TRO, these Answering

10 Respondents deny the same as to these Answering Respondents.

11 27. Answering the allegations contained in paragraph 27 of the TRO, these Answering

12 Respondents deny the same as to these Answering Respondents.

13 28. Answering the allegations contained in paragraph 28 of the TRO, these Answering

14 Respondents deny the same as to these Answering Respondents.

15 29. Answering the allegations contained in paragraph 29 of the TRO, these Answering

16 Respondents deny the same as to these Answering Respondents.

17 30. Answering the allegations contained in paragraph 30 of the TRO, these Answering

18 Respondents deny the same as to these Answering Respondents.

19 31. Answering the allegations contained in paragraph 31 of the TRO, these Answering

20 Respondents deny the same as to these Answering Respondents.

21 32. Answering the allegations contained in paragraph 32 of the TRO, these Answering

22 Respondents deny the same as to these Answering Respondents.

1 33. Answering the allegations contained in paragraph 33 of the TRO, these Answering  
2 Respondents admit that Campbell realized on or about 04-21-06, at a meeting with  
3 Respondent Pierson and assayers Bob Waisilew and Bob Gunnison, Campbell discovered  
4 that the use of HCl in the Galleon Process may be ineffective to recover PGM's.  
5

6 34. Answering the allegations contained in paragraph 34 of the TRO, these Answering  
7 Respondents allege that about 04-21-06, at a meeting with Respondent Pierson and assayers  
8 Bob Waisilew and Bob Gunnison, Respondent Campbell discovered that the use of HCl in  
9 the Galleon Process may be ineffective to recover PGM's.  
10

11 35. Answering the allegations contained in paragraph 35 of the TRO, these Answering  
12 Respondents admit the same.

13 36. Answering the allegations contained in paragraph 36 of the TRO, these Answering  
14 Respondents deny the same as to these Answering Respondents.

15 37. Answering the allegations contained in paragraph 37 of the TRO, these Answering  
16 Respondents deny the same as to these Answering Respondents.

17 38. Answering the allegations contained in paragraph 38 of the TRO, these Answering  
18 Respondents are without sufficient information to admit or deny the same and, therefore,  
19 deny the same.  
20

21 39. Answering the allegations contained in paragraph 39 of the TRO, these Answering  
22 Respondents are without sufficient information to admit or deny the same and, therefore,  
23 deny the same.  
24  
25

1 40. Answering the allegations contained in paragraph 40 of the TRO, these Answering  
2 Respondents are without sufficient information to admit or deny the same and, therefore,  
3 deny the same.

4 41. Answering the allegations contained in paragraph 41 of the TRO, these Answering  
5 Respondents are without sufficient information to admit or deny the same and, therefore,  
6 deny the same.

7 42. Answering the allegations contained in paragraph 42 of the TRO, these Answering  
8 Respondents deny the same as to these Answering Respondents.

9 43. Answering the allegations contained in paragraph 43 of the TRO, these Answering  
10 Respondents deny the same as to these Answering Respondents.

11 44. Answering the allegations contained in paragraph 44 of the TRO, these Answering  
12 Respondents deny the same as to these Answering Respondents.

13 45. Answering the allegations contained in paragraph 45 of the TRO, these Answering  
14 Respondents deny the same as to these Answering Respondents.

15 46. Answering the allegations contained in paragraph 46 of the TRO, these Answering  
16 Respondents deny the same as to these Answering Respondents.

17 47. Answering the allegations contained in paragraph 47 of the TRO, these Answering  
18 Respondents deny the same as to these Answering Respondents.

19 48. These Answering Respondents deny each and every allegation not specifically admitted  
20 herein.

21 **PRAYER FOR RELIEF**

22 Respondents Campbell request relief as follows:  
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1 A. For a hearing pursuant to, inter alia, A.C.C. R14-4-305;

2 B. Setting aside the Temporary Order pertaining to these Answering Defendants.

3 C. For such other and further relief as is just and proper.

4 RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of October, 2006.

5  
6 PETER STROJNIK, P.C.

7   
8 Peter Strojnik

9 Attorneys for Respondents Campbell

10 The original of the foregoing mailed  
11 This 30<sup>th</sup> day of October, 2006, to:

12 Arizona Corporation Commission  
13 1200 West Washington  
14 Phoenix, Arizona 85007

15 And a courtesy copy to:

16 Mike Dailey, Esq.  
17 Enforcement Attorney  
18 Arizona Corporation Commission – Securities Division  
19 1300 West Washington, Third Floor  
20 Phoenix, Arizona 85007  
21 By e-mail only mdailey@azcc.gov  
22  
23  
24  
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